

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IRON MAIDEN HOLDINGS, LTD.,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A",

Defendants.

Case No.: 1:20-cv-01590

Judge Jorge L. Alonso

Magistrate Judge Jeffrey Cummings

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff, Iron Maiden Holdings, Ltd., ("Iron Maiden" or "Plaintiff"), by its undersigned counsel, hereby files this Motion requesting leave to file the following documents under seal: (1) Plaintiff's Schedule "A" attached to the Complaint, which includes a list of the Defendant Online Marketplace Accounts; and (2) screenshot printouts showing the active Defendant Internet Stores for the Defendant Online Marketplace Accounts (Exhibit 3 to the Declaration of Paul Varley).

In this action, Iron Maiden is requesting temporary *ex parte* relief based on an action for: trademark infringement and counterfeiting; false designation of origin, passing off and unfair competition; violation of the Illinois Uniform Deceptive Trade Practices Act; and, copyright infringement. Sealing this limited portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence as well as the hiding and/or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere

with this Court's power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Iron Maiden Holdings, Ltd. will move to unseal these documents.

Dated: March 4, 2020

Respectfully submitted,

/s/ Ann Marie Sullivan

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was electronically-filed on March 4, 2020, with the Clerk of the Court using the CM/ECF system, which will automatically send an email notification of such filing to all registered attorneys of record.

/s/ Alison Carter

Alison Carter